

REMARKS/ARGUMENTS

Claims 10-11, 13-18, and 20-27 are pending in the Application. Claim 10 has been amended to require impregnating and/or coating fibrous and/or granular substrates with a thermally polymerizable mixture, and thermally polymerizing the thermally polymerizable mixture to bind the fibrous and/or granular substrates and form the article. Support therefore is found in the Specification at page 2, lines 8-13; page 2, line 40, to page 3, line 8; and page 7, lines 11-41. Also in Claim 10, the phrase “wherein the multifunctional macromonomer comprises at least one free-radically polymerizable group” has been changed to wherein the multifunctional macromonomer has at least one free-radically polymerizable group. Support therefor is found in the Specification at page 2, lines 1-6, and page 3, lines 4-8. Claim 25 has been amended to require heating the impregnated substrate to a temperature from 180 to 220°C to polymerize the thermally polymerizable mixture and bind the fibrous and/or granular substrates. Support therefore is found in the Specification at page 2, lines 8-13; page 2, line 40, to page 3, line 8; and page 7, lines 11-41. Claim 15 has been amended to delete the extraneous “or” after “and/or”. To eliminate the Examiner’s objection, Claim 25 has been amended to delete the extraneous “.”

No new matter has been added.

Rejections under 35 U.S.C. 112, first ¶

Claims 10-11, 13-18, 20-25 and 27 stand rejected under 35 U.S.C. 112, 1<sup>st</sup> ¶, for lack of a written description in the Specification as originally filed, i.e., for new matter. The Examiner’s findings that support for a thermally polymerizable mixture which “does not comprise monomers other than the multifunctional macromonomer” of Claims 10-11, 13-18, and 27 and a thermally polymerizable mixture which “consists essentially of . . . a multifunctional macromonomer . . . and . . . a radical polymerization initiator “ of Claims 23

and 25 does not appear in the original Specification (Office Action dated March 2, 2009 (OA, pp. 2-3, ¶ 4)), are clearly erroneous.

At page 3, lines 4-6, the Specification teaches, “The object is achieved according to the invention by thermally polymerizable mixtures consisting of multifunctional macromonomers comprising at least one free-radically polymerizable group and polymerization initiators.” Original Claim one was directed to “[t]he use of a thermally polymerizable mixture consisting of a multifunctional macromonomer . . . and a polymerization initiator . . . .” Persons having ordinary skill in the art would have understood that the transitional phrase “consisting of” closes the thermally polymerizable mixture to the inclusion of materials other than those recited except for ordinary impurities. *In re Gray*, 53 F.2d 520 (CCPA 1931); *Ex parte Davis*, 80 USPQ 448, 450 (Bd. App. 1948). On the other hand, the Specification also teaches that the thermally polymerizable mixtures consisting of multifunctional macromonomers may contain polymerization “inhibitors” (Spec., p. 5, ll. 33-34) and “at least one customary additive in the customary amounts, for example emulsifiers, pigments, fillers, curing agents, antimigration agents, plasticizers, biocides, dyes, antioxidants, and waxes” (Spec., p. 7, ll. 4-9) which does not materially effect the basic and novel characteristics of the claimed invention. Accordingly, it is unreasonable for the Examiner to find that the subject matter Applicant claims was not in the possession of, or was not invented by, the present inventor at the time this Application was first filed.

To satisfy the written description requirement of 35 U.S.C. 112, 1<sup>st</sup> ¶, it is only necessary that the Specification “reasonably conveys to the artisan that the inventor had possession at the time of the later claimed subject matter.” *Vas-Cath Inc. v. Mahurkar*, 935 F.2d 1555, 1563 (Fed. Cir. 1991); *In re Kaslow*, 707 F.2d 1366, 1375 (Fed. Cir 1983). The written description requirement does not require a description of the subject matter ultimately claimed “*in haec verba*,” or “*in ipsis verbis*,” or in the same words. *In re Lukach*, 442 F.2d

967, 969 (CCPA 1971). Persons having ordinary skill in the art are reasonable and invariably exercise common sense. *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, \_\_\_\_ (2007).

The Examiner's position is explained as follows (OA, pp. 11-12, bridging ¶):

[W]hile the original claim used the transitional phrase "consisting of" to describe the thermally polymerizable mixture, it used the transitional phrase "comprising" to describe the multifunctional macromonomer. Thus, it is the examiner's position that thermally polymerizable mixture is closed to components other than multifunctional macromonomer and radical initiator, but multifunctional macromonomer is open to monomer components other than those listed in the claim 10. Specifically, claim 10 recites "multifunctional macromonomer comprises at least one free-radically polymerizable group". In fact, multifunctional macromonomer of claim 15 can be prepared by reacting with a diol and does not have to be a free-radically polymerizable group listed in independent claim 10 on which claim 15 is dependent. Thus, it is the examiner's position that the present claims only require that multifunctional macromonomer comprise at least one free-radically polymerizable group and does not exclude other monomer components.

The Examiner's findings are clearly erroneous because the Examiner's interpretation of the claim language is unreasonable and erroneous as a matter of law.

First, the Examiner concludes that a multifunctional macromonomer comprising at least one free-radically polymerizable group means a macromonomer comprising at least one free-radically polymerizable monomer. That interpretation is inconsistent with the claim language when considered in its context because persons having ordinary skill in the art reasonably would have understood that the phrase "comprise at least one free-radically polymerizable group selected from the group consisting of an acrylate group, a methacrylate group, a maleate group, a vinyl ether group, a vinyl group, and an allyl group" means has at least one free-radically polymerizable radical selected from the group consisting of an acrylate radical, a methacrylate radical, a maleate radical, a vinyl ether radical, a vinyl radical, and an allyl radical. The "free-radically polymerizable group" is a functional groups of the multifunctional macromonomer. It is not a separate and distinct monomer. For example, when referring to the prior art in the paragraph bridging page 2 of the Specification, Applicant describes "oligomers or polymers having polymerizable, unsaturated functional

groups such as acrylate, methacrylate, vinyl, vinyl ether, allyl or maleate groups (Spec., p. 2, ll. 2-4). While the Specification describes multifunctional macromonomers “comprising at least one free-radically polymerizable group” (Spec., p. 3, ll. 5-6), immediately thereafter the Specification teaches that “[t]he macromonomers contain for example acrylate, methacrylate, maleate, vinyl ether, vinyl and/or allyl groups as free-radically polymerizable groups” (Spec., p. 3, ll. 6-8). Persons having ordinary skill in the art would not have understood that the claimed multifunctional macromonomer of Applicant’s Claim 10 is open to monomers other than the multifunctional macromonomer having at least one of the free-radically polymerizable group selected from the identified grouping of unsaturated radicals.

The Examiner argues, however, that Claim 15 proves that the multifunctional macromonomer is open to a diol monomer. The Examiner has misconstrued the language of Claim 15 and the corresponding teaching in the Specification at page 4, lines 35-40. Claim 15 identifies the multifunctional macromonomer of Claim 10 as a macromonomer “obtained by a process comprising co-reacting,” or as the reaction product of, a) a 2- to 6-hydric alkoxyated alcohol with b) a 2- to 4-basic C<sub>3</sub> to C<sub>16</sub> carboxylic acid and/or anhydride, c) acrylic acid and/or methacrylic acid, and d) diol. The diol is one of the co-reactants which forms the multifunctional macromonomer. The diol is not a monomer additional to the multifunctional macromonomer. The Examiner erred in construing the scope and content of Claim 15.

The Examiner’s finding of new matter is based on unreasonable and erroneous claim interpretation. Properly read in light of the specification, persons having ordinary skill in the art would have understood that the multifunctional macromonomer of Applicant’s claims is itself defined by at least one free-radically polymerizable radical selected from the identified Markush grouping thereof. The multifunctional macromonomer of Applicant’s claims is not a macromonomer composition which is open to monomers other than the defined

macromonomer. The Examiner's finding of new matter is clearly erroneous and fairly should be withdrawn.

Rejections under 35 U.S.C. 103

1. Arkens

Claims 10-11, 13-14, and 21-24 are rejected under 35 U.S.C. 103 in view of Arkens (U.S. Patent 5,661,213, issued August 26, 1997). The rejection should be withdrawn.

As is evident from the Summary of the Invention (Arkens, col. 2, ll. 55-62), Arkens' invention is directed to a curable aqueous composition comprising: (a) a polyacid comprising at least two carboxylic acid groups or anhydrides or salts thereof, (b) a polyol comprising at least two hydroxyl groups, and (c) a phosphorous-containing accelerator. The curable composition is used as a binder for nonwoven fibers such as fiberglass (Arkens, col. 2, ll. 55-58).

It is important to understand that Arkens' polyacid is a polymeric polyacid. The polymeric polyacid is "preferably an addition polymer formed from at least one ethylenically unsaturated monomer" (Arkens, col. 3, ll. 57-59; emphasis added). The addition polymer so formed must contain at least two carboxylic acid groups (Arkens, col. 4, ll. 1-2). However, contrary to the Examiner's findings (OA, p. 13, 2<sup>nd</sup> full ¶), it is not true that Arkens' "addition polymer must contain ethylenically unsaturated carboxylic acid and anhydride groups" or that the "monomers used in Arkens . . . contain at least one polymerizable double bond." The polyacid addition polymer must contain at least two carboxylic acid groups and it "may be" formed by free-radical polymerizing unsaturated carboxylic acids (Arkens, col. 4, ll. 2-20). Arkens expressly states (Arkens, col. 4, ll. 59-62):

The addition polymer may be prepared by solution polymerization, emulsion polymerization, or suspension polymerization techniques for polymerizing ethylenically-unsaturated monomers which are well known in the art.

Ethylenically-unsaturated monomers are free-radically polymerized through via their unsaturated groups. Arkens adds (Arkens, col. 5, ll. 6-11):

The polymerization reaction to prepare the addition polymer may be initiated by various methods known in the art such as, for example, by using thermal decomposition of an initiator and by using an oxidation-reduction reaction . . . to generate free radicals to effect the polymerization.

In fact, the formed addition polymer in most of Arkens' examples is polyacrylic acid.

Polyacrylic acid is formed by polymerizing the ethylenically unsaturated acid, acrylic acid.

However, polyacrylic acid contains little, if any, residual or unreacted ethylenically unsaturated double bonds once the ethylenically unsaturated acids are polymerized. See Arkens' Examples 1-8, 10-14, and 16-18.

Moreover, even if persons having ordinary skill in the art might, without basis, reasonably have expected that polyacid polymers formed by free-radically polymerizing an ethylenically unsaturated acid would have from 0.1 to 1.0 moles of unreacted residual double bonds per 100g of polymer and would be polymerizable multifunctional macromonomers as a result, the thermally polymerizable mixture of Applicant's claimed methods are closed to monomers other than the multifunctional macromonomer and therefore exclude the mandatory polyol component of the method Arkens' describes.

Finally, the Examiner suggests that it would have been *prima facie* obvious to a person having ordinary skill in the art to carry out Arkens' process steps in any order (OA, p. 4, last ¶). Of course, Arkens does not suggest or even contemplate curable compositions which are not the reaction products of polyacid polymers and polyols. More importantly, it is unclear from Arkens's disclosure that reaction products of ethylenically unsaturated diacids and polyols are curable at the temperatures and in the time Arkens prefers. Patentability determinations should never be based on speculation. *In re Steele*, 305 F.2d 859, 862 (CCPA 1962).

In short, the Examiner has not satisfied the PTO's initial burden to establish a factual basis for its rejection under 35 U.S.C. 103. Therefore, the rejection should be withdrawn.

2. Arkens in view of Rockrath

Claims 15-18 stand rejected under 35 U.S.C. 103 over Arkens in view of Rockrath (U.S. 6,835,420, issued December 28, 2004). The rejection should be withdrawn.

Rockrath does not rectify the deficiencies of Arkens. Moreover, the addition of an epoxy compound to Arkens' curable compositions would likely eliminate the reactive polyol functional groups from the composition and seemingly prevent Arkens composition from curing. Moreover, the addition of a free-radical initiator to Arkens' curable composition would appear to be fruitless since neither Arken's polyacid polymer nor its polyol component contains free-radically polymerizable ethylenically unsaturated groups.

3. Beck in view of Fujioka

Claims 10 and 15 stand rejected under 35 U.S.C. 103 over Beck (U.S. 5,096,938, issued March 17, 1992) in view of Fujioka (JP 60-163914). The rejection should be withdrawn.

Beck is silent with regard to both impregnating and/or coating fibrous and/or granular substrates with a thermally polymerizable mixture and thermally polymerizing the thermally polymerizable mixture to bind fibrous and/or granular substrates to form an article. Beck's polymerizable mixture is radiation curable (Beck, Claims 1-6). Beck instructs persons having ordinary skill in the art to radiation-cure its polymerizable mixture "by electron beams or, after the addition of a photoinitiator, by UV radiation . . ." (Beck, col. 3, ll. 36-40). Beck coats its polymerizable mixtures onto flat substrates such as glass to a wet thickness of 100  $\mu\text{m}$  and applies UV radiation thereto to cure the coating (Beck, col. 5, ll. 40-46). The cured coating is said to be scratch-resistant (Beck, col. 5, ll. 48-49).

According to the method Applicant claims, fibrous and/or granular substrates are impregnated and/or coated with a thermally polymerizable mixture and thermally polymerized to bind the fibrous and/or granular substrates to form an article. Whether or not Beck's polymerizable mixtures are both radiation and thermally polymerizable, Beck does not reasonable suggest thermally curing its polymerizable mixtures. Beck's does not suggest impregnating and/or coating fibrous and/or granular substrates to bind them together. To bind fibrous and/or granular substrates together, Applicant's polymerizable mixture must impregnate and/or coat the fibrous and/or granular substrates thoroughly rather than form a layer on or over the substrates. Moreover, fibrous and/or granular substrates impregnated and/or coated with polymerizable mixture cannot be uniformly cured by radiation.

Applicant's Specification teaches (Spec., p. 2, ll. 8-13; emphasis added):

In processes wherein the addition polymerization of binders such as monomers or prepolymers is effected in a fiber matrix with the aid of radiative curing, the binder coated fiber material can only be cured to the extent that the radiation will penetrate the material. Since radiation intensity decreases quickly with increasing layer thickness, however, nonuniform polymerization of the monomers or prepolymers is likely unless certain costly and inconvenient measures are taken.

The Examiner's finding that Beck's "binder is generic to all coatings" does not provide any suggestion, motivation, or guidance to coat fibrous and/or granular substrates with thermally polymerizable mixtures and thermally polymerizing the polymerizable mixtures to bind the substrates together to form an article. Whether or not Fujioka would have taught persons having ordinary skill in the art that certain of Beck's polymerization mixtures with particular initiators are thermally curable, the combined teachings of Beck and Fujioka would not have led persons having ordinary skill in the art to (1) impregnate and/or coat fibrous and/or granular substrates with radiation curable mixtures and then thermally cure those radiation curable mixtures to uniformly cure and bind the substrates to form an article.



4. Beck and Rockrath

Claim 16 stands rejected under 35 U.S.C. 103 over Beck in view of Rockrath. The rejection should be withdrawn.

Rockrath does not cure the deficiencies of Beck. The combined teachings of Beck and Rockrath would not have led persons having ordinary skill in the art to apply Beck's radiation curable mixtures to fibrous and/or granular substrates and thermally cure the mixtures as applied to bind the substrates together and form an article. Moreover, it is unclear how the addition of a polyisocyanate to Beck's curable mixture would effect the design and function of Beck's curable mixtures. The combined prior art disclosures do not provide persons having ordinary skill in the art with any suggestion to perform the method Applicant claims with any reasonable expectation of success. The Examiner's rejection has no factual basis in the applied prior art. There is no reasonable basis leading from the prior art processes to one Applicant claims. The rejection should be withdrawn.

5. Rockrath (WO)

Claims 10-11, 13-14, 17-18, and 20-27 stand rejected under 35 U.S.C. 103 in view of Rockrath (WO 01/12736, published February 22, 2001). The Examiner cites Rockrath (US) for the teaching of Rockrath (WO). The rejection should be withdrawn.

Applicant's claims now require impregnating and/or coating fibrous and/or granular substrates with a thermally polymerizable mixture and thermally polymerizing the mixture to bind the fibrous and/or granular substrates (Currently Amended Claim 10) or heating the impregnated substrates to polymerize the thermally polymerizable mixture and bind the fibrous and/or granular substrates (Currently Amended Claim 25). Rockrath would not have reasonably suggested a method Applicant claims to a person having ordinary skill in the art for a variety of reasons.

First, Rockrath uses a thermally curable coating material to produce a “highly scratch-resistant multicoat clearcoat system” for automobile finishing and refinishing (Rockrath, col. 1, ll. 8-34). Rockrath recognizes that automobile finishes have “very high optical demands regarding gloss, surface smoothness, and color” (Rockrath, col. 1, ll. 32-34). Rockrath’s fibrous substrates are fiber composites or fiber-reinforced plastics over which hard, glossy, scratch-resistant finishes may be applied (Rockrath, col. 19, ll. 30, to col. 20, l. 17). Rockrath’s fiber composites or fiber-reinforced plastics are not “fibrous and/or granular substrates” which may be impregnated and/or coated with a thermally polymerizable mixture and thereafter thermally polymerized to “bind the fibrous and/or granular substrates” as Applicant’s claims currently require. Applicant’s Specification teaches that the fibrous substrates of the presently claimed process are “glass fibers, rock wool, natural fibers such as cotton, fibers composed of wood and sisal, manufactured fibers composed of polyester, polyacrylonitrile and nylon” (Spec., p. 7, ll. 11-31) which are capable of being penetrated or impregnated by thermally polymerizable mixtures and bound together when the fibrous and/or granular substrates are impregnated and/or coated by the thermally polymerizable mixture and thermally polymerized (Spec., p. 7, ll. 11-36). There is no impregnation or penetration of fibrous and/or granular substrates when Rockrath’s curable coatings are applied to its fiber composites or fiber-reinforced plastics and most certainly no curing to bind the fibrous and/or granular substrates together.

Unlike Applicant’s Specification (Spec., p. 2, ll. 8-13), Rockrath teaches that its thermally cured coatings may be cured either by heating or actinic radiation with equal success (Rockrath, col. 20, ll. 39-43; col. 21, l. 43, to col. 22, l. 9). Rockrath can make that statement because its coatings have a “dry film thickness of from 10 to 100  $\mu\text{m}$  when applied to the otherwise bound fibers in fiber composites or fiber-reinforced plastics (Rockrath, col. 20, ll. 13-17). Rockrath’s coatings are polymerized to form hard, glossy, scratch-resistant

finishes (Rockrath, col. 19, ll. 30, to col. 20, l. 17). Rockrath can make that statement because they are applied to automobile body surfaces formed of fiber composites or fiber-reinforced plastics. On the other hand, the articles formed in accordance with Applicant's claimed process cannot be uniformly polymerized by actinic radiation without additional "costly and inconvenient measures" (Spec., p. 2, ll. 8-13). The evidence shows that Rockrath's method is entirely different from the method Applicant claims.

The Examiner maintains that Rockrath's thermally curable coatings comprise an olefinically unsaturated polysiloxane macromonomer and cites Rockrath, col. 7, lines 59-63, in support thereof (OA, p. 14). At column 7, lines 57-66, Rockrath states:

The binders (A) for inventive use may contain the polysiloxane macromonomers in copolymerized form in widely varying amounts. Owing to their high functionality of on average more than 3.0 double bonds per molecule, a fraction of . . . binder (A), is sufficient in the great majority of cases to achieve the technical effects and advantages according to the invention.

At column 8, lines 6-9, Rockrath teaches:

The binders (A) for inventive use contain at least two, particularly at least three, functional groups (a1) which are able to undergo thermal crosslinking reactions with complementary functional groups (b1) in crosslinking agent (B).

As can be seen from the Table at column 8, lines 25-46, there is no requirement that either functional group (a1) or functional group (b1) is a double bond. In fact, it is the exception for the functional group to be a double bond (Rockrath, col. 8, ll. 25-46).

Contrary to the Examiner's finding, Rockrath teaches (Rockrath, col. 4, ll. 28-31; emphasis added):

[A]t least one binder (A) contains in copolymerized form at least one olefinically unsaturated polysiloxane macromonomer containing on average per molecule at least 3.0 double bonds.

To form binder (A), Rockrath copolymerizes an olefinically unsaturated polysiloxane macromonomer with at least one other unsaturated monomer to form the binder (A) having at least two functional groups. Before being copolymerized, Rockrath's olefinically unsaturated

polysiloxane macromonomer contains on average per molecule at least 3.0 double bonds. In copolymerized form, the polysiloxane macromonomer no longer contains double bonds available for free-radical polymerization. Crosslinking and free-radical polymerizing via ethylenically unsaturated groups are not the same process at all. In copolymerized form, the polysiloxane macromonomer units of binder (A) of Rockrath's curable composition no longer comprise at least one free-radically polymerizable group selected from the group consisting of an acrylate group, a methacrylate group, a maleate group, a vinyl ether group, a vinyl group, and an allyl group. At every appearance in Rockrath's disclosure, binder (A) is a crosslinkable copolymer formed from an unsaturated polysiloxane macromonomer and another unsaturated monomer. See Rockrath, col. 6, l. 49, to col. 7, l. 50. Note especially Rockrath, col. 7, l. 57, to col. 8, l. 47. Rockrath expressly states (Rockrath, col. 7, ll. 57-66; emphasis added), "The binder (A) for inventive use may contain the polysiloxane macromonomers in copolymerized form in varying amounts."

Binder (a) of Rockrath's Claim 1 "contains in copolymerized form at least one olefinically unsaturated polysiloxane macromonomer" (Rockrath, cols. 29-30; emphasis added). That Rockrath's copolymerized polysiloxane macromonomers no longer contain unsaturated double bonds is most evident from Rockrath's supporting examples. In Rockrath's Example 1, to form polyacrylate [binder] (A) Rockrath charges a reactor with "a monomer mixture of . . . ethylhexyl acrylate, . . . hydroxyethyl methacrylate, . . . styrene, . . . 4-hydroxybutyl acrylate, and . . . hexaacrylate-functional polysiloxane . . . and an initiator" and polymerizes the mixture of monomers at 140°C (Rockrath, col. 24, ll. 16-43; emphasis added).

That persons having ordinary skill in the art would have understood that Rockrath's thermocuring reactions do not involve the polymerization of unsaturated monomers is further

evident from the advantageously low thermocuring temperatures of from 50 to 100°C that Rockrath recommends (Rockrath, col. 21, ll. 32-42).

The Examiner's findings do not appear to be supported by Rockrath's disclosure. While the Examiner holds strong to the position that Rockrath's polysiloxane macromonomer retains its unsaturation after being copolymerized, the teaching of Rockrath as a whole does not support the Examiner's finding. Again, the Examiner is asked to review Rockrath's Preparation Examples 1 to 6 to fully comprehend what Rockrath means by the phrase "wherein the at least one binder contains in copolymerized form at least one olefinically unsaturated polysiloxane macromonomer . . ." (Rockrath, Claim 1).

Finally, the functional groups of binder (A) must be crosslinkable with corresponding functional groups on the crosslinking agent used in Rockrath's process. Even assuming that Rockrath's binder (A) has double bonds available for free-radical polymerization, Applicant's claimed process excludes "monomers other than the multifunctional macromonomer" comprising "at least one free-radically polymerizable group selected from the group consisting of an acrylate group, a methacrylate group, a maleate group, a vinyl ether group, a vinyl group, and an allyl group" (Claim 10). If Rockrath's thermally curable material comprising binder (A) retains a certain amount of double bonds as functional groups, Rockrath's thermally curable material requires a crosslinking agent with corresponding functional groups, i.e., a monomer other than the multifunctional macromonomer, which Applicant's thermally polymerizable mixture excludes.

Said in another way, if at least one of the functional groups of Rockrath's binder (A) has ethylenically unsaturated double bonds available for crosslinking, then Rockrath instructs that its crosslinking agent must contain complementary unsaturated double bonds for crosslinking. Therefore, even if the Examiner's interpretation of Rockrath's teaching were correct, Rockrath's thermally polymerizable mixture would necessarily comprise "monomers

other than the multifunctional macromonomer" which the process Applicant claims expressly excludes. Rockrath's thermally curable coating material includes a binding agent (A) and a crosslinking agent (B). Binding agent (A) has at least two functional groups which must correspond to at least two functional groups of the crosslinking agent (B). In short, Rockrath's thermally curable coating composition must contain at least two distinct monomers. The process Applicant claims consists essentially of one multifunctional macromonomer having at least one free-radically polymerizable ethylenically unsaturated group.

When Applicant's macromonomer is thermally polymerized, it reacts with itself. No corresponding functional groups are required for copolymerization or crosslinking. Rockrath's product is cured by crosslinking. On review of all the evidence in Rockrath, the Examiner should withdraw the standing rejections.

For the reasons stated, all the Examiner's rejections should be withdrawn. Applicant's pending Claims 10-11, 13-18, and 20-27 are in condition for allowance. Early notice of allowance is earnestly requested.

Respectfully submitted,

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